D.L.R. Sportfishing Inc.

Gentleman Sportfishing
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October 13, 2021

California Air Resources Board c/o CHC2021 1001 "I" Street Sacramento, CA 95814 Attn: Liane Randolph

Dear Ms. Randolph:

At just 12 years old, I found my passion for the industry while spending all my free time on fishing boats along the California Coast. When I was old enough, I volunteered to scrub the boats and assist the deckhands. I loved everything about being out on the ocean while bringing home dinner for my family. It comes as no surprise that I went on to build a successful business right where I grew up. Because of this industry, I am able to provide for my family. Without it, my experience and knowledge would be useless, forcing me to start over with nothing.

It is impossible to work on the ocean and not love and appreciate the environment. I understand the importance of achieving a balance in order to protect the habitats and the creatures that live there. Reducing emissions worldwide is vital to protecting our ocean and our planet. We demonstrated our commitment to this by repowering our engines in 2013.

The regulations, as they are drafted, require technology that has not been developed or proven safe at sea, and consequently are economically and structurally impossible to comply with – requiring boats constructed of wood/fiberglass like mine to be removed from service as soon as 2031. With the COVID-19 pandemic, we already have had to adjust to smaller loads and lower incomes. With these regulations, I would be required to, somehow, overcome the economic hardships I have faced due to the pandemic, and finance a new boat having it in operation by 2034. I cannot afford a new boat and, with my boat deemed non-compliant in California, I couldn't even use its value to help finance a new loan, assuming I could even find a lender willing to approve it.

As a small fishing vessel owner, I provide jobs to several others in the industry and contribute to the local city and county tourism economy. We provide essential access to fresh, nutrient-rich food for every citizen who seeks it. We also donate our time and resources to charities and non-profits giving veteran's, children, and others the opportunity to experience a day at sea.

Historically, CARB has regulated commercial fishing/whale-watching boats and commercial passenger boats the same way – their engines are technically identical. CARB's proposed regulations apply a double standard with commercial fishing boats subject to substantially less stringent and less costly requirements. CARB should return passenger boats to the same vessel category as commercial fishing boats so that business owners like me can continue to transition to lower emission engines as it is economically feasible and when technology becomes available.

Removing my boat from service would end my business and put me out of work, leaving me unable to provide for my family and rendering my knowledge, experience, and lifelong investment worthless. It would also limit access to the marine environment for all but the most affluent Californians. In the absence of small business owners, unsatisfied demand will most certainly be filled by large corporations without the knowledge, expertise, or devotion to protecting our local wildlife. I am asking you to reconsider these regulations that would result in great hardship for me and many others like me.

Sincerely,

Don Rowell

Owner and Captain

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